

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SYNQOR, INC.,

Plaintiff,

v.

ARTESYN TECHNOLOGIES, INC., ASTEC
AMERICA, INC., BEL FUSE INC., CHEROKEE
INTERNATIONAL CORP., DELTA ELECTRONICS,
INC., DELTA PRODUCTS CORP., LINEAGE
POWER CORP., MURATA ELECTRONICS NORTH
AMERICA, INC., MURATA MANUFACTURING
CO., LTD., MURATA POWER SOLUTIONS, INC.,
POWER-ONE, INC.,

Defendants.

Civil Action No.: 2:07cv497

JURY TRIAL DEMANDED

**ANSWER OF DEFENDANT BEL FUSE INC. TO SYNQOR'S SECOND
AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Defendant Bel Fuse Inc. ("Bel Fuse"), by the undersigned attorney, hereby answers the Complaint in the above civil action as follows:

THE PARTIES

1. In answer to paragraph 1 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.
2. In answer to paragraph 2 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

3. In answer to paragraph 3 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

4. In answer to paragraph 4 of the Complaint, Bel Fuse admits its principal place of business, state of incorporation and address. Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of the paragraph because the product names stated therein are insufficiently defined in the Complaint.

5. In answer to paragraph 5 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

6. In answer to paragraph 6 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

7. In answer to paragraph 7 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

8. In answer to paragraph 8 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

9. In answer to paragraph 9 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

10. In answer to paragraph 10 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

11. In answer to paragraph 11 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

12. In answer to paragraph 12 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations concerning other defendants named in the Complaint.

JURISDICTION AND VENUE

13. In answer to paragraph 13 of the Complaint, Bel Fuse admits that this action purports to be an action for patent infringement, arising under the patent laws of the United States, Title 35 of the United State Code. Bel Fuse further admits that this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

14. In answer to paragraph 14 of the Complaint, Bel Fuse admits the allegations therein so far as they pertain to Bel Fuse. So far as the allegations pertain to the other defendants in this action, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations.

15. In answer to paragraph 15 of the Complaint, so far as the allegations therein pertain to Bel Fuse, Bel Fuse denies that it makes, imports, uses, offers to sell and/or sells any products that infringe the patents at issue in this action. Bel fuse admits that it sells products in the United States, including the state of Texas and this judicial district, that have been accused of infringing the patents at issue in this action. So far as the allegations pertain to the other

defendants in this action, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations.

16. In answer to paragraph 16 of the Complaint, so far as the allegations therein pertain to Bel Fuse, Bel Fuse denies that has committed any acts of infringement in this judicial district. Bel Fuse admits that it is subject to personal jurisdiction in this judicial district. So far as the allegations pertain to the other defendants in this action, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations.

17. In answer to paragraph 17 of the Complaint, Bel Fuse admits to venue.

GENERAL ALLEGATIONS

18. In answer to paragraph 18 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein, except that Bel Fuse denies that the '190 patent was duly and legally issued, and admits that a true copy thereof is attached as Exhibit A to the Complaint.

19. In answer to paragraph 19 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein, except that Bel Fuse denies that the '021 patent was duly and legally issued, and admits that a true copy thereof is attached as Exhibit B to the Complaint.

20. In answer to paragraph 20 of the Complaint, as the '034 patent has not been asserted against Bel Fuse, Bel Fuse, therefore, refuses to answer this paragraph or, if an answer is required, denies the allegations therein.

21. In answer to paragraph 21 of the Complaint, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein, except that Bel

Fuse denies that the '083 patent was duly and legally issued, and admits that a true copy thereof is attached as Exhibit D to the Complaint.

COUNT ONE
The Emerson Affiliates' Infringement of the '190 Patent

22. In answer to paragraph 22 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

23. In answer to paragraph 23 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

24. In answer to paragraph 24 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

25. In answer to paragraph 25 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

26. In answer to paragraph 26 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWO
The Emerson Affiliates' Infringement of the '021 Patent

27. In answer to paragraph 27 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

28. In answer to paragraph 28 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

29. In answer to paragraph 29 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

30. In answer to paragraph 30 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

31. In answer to paragraph 31 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT THREE
The Emerson Affiliates' Infringement of the '034 Patent

32. In answer to paragraph 32 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

33. In answer to paragraph 33 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

34. In answer to paragraph 34 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

35. In answer to paragraph 35 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

36. In answer to paragraph 36 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT FOUR
The Emerson Affiliates' Infringement of the '083 Patent

37. In answer to paragraph 37 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

38. In answer to paragraph 38 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

39. In answer to paragraph 39 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

40. In answer to paragraph 40 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

41. In answer to paragraph 41 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT FIVE
Bel Fuse's Infringement of the '190 Patent

42. In answer to paragraph 42 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

43. In answer to paragraph 43 of the Complaint, Bel Fuse denies the allegations contained therein.

44. In answer to paragraph 44 of the Complaint, Bel Fuse denies the allegations contained therein.

45. In answer to paragraph 45 of the Complaint, Bel Fuse denies the allegations contained therein.

46. In answer to paragraph 46 of the Complaint, Bel Fuse denies the allegations contained therein.

COUNT SIX
Bel Fuse's Infringement of the '021 Patent

47. In answer to paragraph 47 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

48. In answer to paragraph 48 of the Complaint, Bel Fuse denies the allegations contained therein.

49. In answer to paragraph 49 of the Complaint, Bel Fuse denies the allegations contained therein.

50. In answer to paragraph 50 of the Complaint, Bel Fuse denies the allegations contained therein.

51. In answer to paragraph 51 of the Complaint, Bel Fuse denies the allegations contained therein.

COUNT SEVEN
Bel Fuse's Infringement of the '083 Patent

52. In answer to paragraph 52 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

53. In answer to paragraph 53 of the Complaint, Bel Fuse denies the allegations contained therein.

54. In answer to paragraph 54 of the Complaint, Bel Fuse denies the allegations contained therein.

55. In answer to paragraph 55 of the Complaint, Bel Fuse denies the allegations therein.

56. In answer to paragraph 56 of the Complaint, Bel Fuse denies the allegations therein.

COUNT EIGHT
Cherokee's Infringement of the '190 Patent

57. In answer to paragraph 57 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

58. In answer to paragraph 58 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

59. In answer to paragraph 59 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

60. In answer to paragraph 60 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

61. In answer to paragraph 61 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT NINE
Cherokee's Infringement of the '021 Patent

62. In answer to paragraph 62 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

63. In answer to paragraph 63 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

64. In answer to paragraph 64 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

65. In answer to paragraph 65 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

66. In answer to paragraph 66 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TEN
Cherokee's Infringement of the '083 Patent

67. In answer to paragraph 67 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

68. In answer to paragraph 68 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

69. In answer to paragraph 69 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

70. In answer to paragraph 70 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

71. In answer to paragraph 71 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT ELEVEN
Delta's Infringement of the '190 Patent

72. In answer to paragraph 72 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

73. In answer to paragraph 73 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

74. In answer to paragraph 74 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

75. In answer to paragraph 75 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

76. In answer to paragraph 76 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWELVE
Delta's Infringement of the '021 Patent

77. In answer to paragraph 77 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

78. In answer to paragraph 78 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

79. In answer to paragraph 79 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

80. In answer to paragraph 80 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

81. In answer to paragraph 81 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT THIRTEEN
Delta's Infringement of the '083 Patent

82. In answer to paragraph 82 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

83. In answer to paragraph 83 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

84. In answer to paragraph 84 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

85. In answer to paragraph 85 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

86. In answer to paragraph 86 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT FOURTEEN
Murata's Infringement of the '190 Patent

87. In answer to paragraph 87 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

88. In answer to paragraph 88 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

89. In answer to paragraph 89 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

90. In answer to paragraph 90 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

91. In answer to paragraph 91 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT FIFTEEN
Murata's Infringement of the '021 Patent

92. In answer to paragraph 92 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

93. In answer to paragraph 93 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

94. In answer to paragraph 94 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

95. In answer to paragraph 95 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

96. In answer to paragraph 96 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT SIXTEEN
Murata's Infringement of the '083 Patent

97. In answer to paragraph 97 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

98. In answer to paragraph 98 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

99. In answer to paragraph 99 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

100. In answer to paragraph 100 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

101. In answer to paragraph 101 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT SEVENTEEN
Power-One's Infringement of the '190 Patent

102. In answer to paragraph 102 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

103. In answer to paragraph 103 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

104. In answer to paragraph 104 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

105. In answer to paragraph 105 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

106. In answer to paragraph 106 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT EIGHTEEN
Power-One's Infringement of the '021 Patent

107. In answer to paragraph 107 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

108. In answer to paragraph 108 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

109. In answer to paragraph 109 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

110. In answer to paragraph 110 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

111. In answer to paragraph 111 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT NINETEEN
Power-One's Infringement of the '034 Patent

112. In answer to paragraph 112 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

113. In answer to paragraph 113 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

114. In answer to paragraph 114 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

115. In answer to paragraph 115 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

116. In answer to paragraph 116 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWENTY
Power-One's Infringement of the '083 Patent

117. In answer to paragraph 117 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

118. In answer to paragraph 118 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

119. In answer to paragraph 119 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

120. In answer to paragraph 120 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

121. In answer to paragraph 121 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWENTY-ONE
Lineage's Infringement of the '190 Patent

122. In answer to paragraph 122 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

123. In answer to paragraph 123 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

124. In answer to paragraph 124 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

125. In answer to paragraph 125 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

126. In answer to paragraph 126 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWENTY-TWO
Lineage's Infringement of the '021 Patent

127. In answer to paragraph 127 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

128. In answer to paragraph 128 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

129. In answer to paragraph 129 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

130. In answer to paragraph 130 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

131. In answer to paragraph 131 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWENTY-THREE
Lineage's Infringement of the '034 Patent

132. In answer to paragraph 132 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

133. In answer to paragraph 133 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

134. In answer to paragraph 134 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

135. In answer to paragraph 135 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

136. In answer to paragraph 136 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

COUNT TWENTY-FOUR
Lineage's Infringement of the '083 Patent

137. In answer to paragraph 137 of the Complaint, Bel Fuse repeats its answers to the preceding paragraphs.

138. In answer to paragraph 138 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

139. In answer to paragraph 139 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

140. In answer to paragraph 140 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

141. In answer to paragraph 141 of the Complaint, as the allegations concern another defendant, Bel Fuse is without knowledge or information sufficient to form a belief as to the truth of the allegations therein.

WILLFUL INFRINGEMENT BY DEFENDANTS

142. In answer to paragraph 142 of the Complaint, Bel Fuse denies the allegations therein, as applied to Bel Fuse.

AFFIRMATIVE DEFENSES

143. Bel Fuse has not infringed nor induced or contributed to infringement of the '190 patent.

144. Bel Fuse has not infringed nor induced or contributed to infringement of the '021 patent.

145. Bel Fuse has not infringed nor induced or contributed to infringement of the '083 patent.

146. The '190 patent is invalid under at least one of 35 U.S.C. §§ 101, 102, 103, 112, and other statutes which may be discovered to be applicable during the course of discovery in the civil action.

147. The '021 patent is invalid under at least one of 35 U.S.C. §§ 101, 102, 103, 112, and other statutes which may be discovered to be applicable during the course of discovery in the civil action.

148. The '083 patent is invalid under at least one of 35 U.S.C. §§ 101, 102, 103, 112, and other statutes which may be discovered to be applicable during the course of discovery in the civil action.

PRAYER FOR RELIEF

WHEREFORE, Bel Fuse prays that the Court deny all of the requests for relief specified by SynQor in the Complaint as they apply to Bel Fuse and particularly requests that the Court:

- A. Render judgment finding that Bel Fuse has not infringed, directly or indirectly, the '190, '021, and '083 patents;
- B. Render judgment that Bel Fuse has not willfully infringed, directly or indirectly, any of the '190, '021, and '083 patents;
- C. Render judgment that each of the '190, '021, and '083 patents is invalid or otherwise unenforceable;
- D. Deny preliminary or permanent injunctions against Bel Fuse and for alleged direct or indirect infringement of the '190, '021, or '083 patents;
- E. Deny an award of compensatory damages against Bel Fuse;

- F. Deny an award of enhanced or of trebled damages against Bel Fuse;
- G. Deny an award of interest against Bel Fuse;
- H. Find that this case against Bel Fuse is not exceptional pursuant to 35 U.S.C. § 285;
- I. Find this to be an exceptional case and award Bel Fuse its reasonable attorney's fees and costs; and
- J. The Court shall award such and other further relief as the Court may deem just and proper.

Respectfully submitted,

/s/ Steven N. Williams
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ATTORNEYS FOR DEFENDANT
BEL FUSE INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on October 2, 2009.

/s/ Steven N. Williams

Steven N. Williams